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ANNUAL OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

I, John A. Short, certify and state that:

- 1. I am the Chief Operating Officer of BalsamWest FiberNET, LLC. and have personal knowledge of BalsamWest's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, the company's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. A further statement outlining the company's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)

John A. Short, General Manager and COO

Date February 3, 2006

Exhibit A Statement of CPNI Procedures and Compliance

BalsamWest FiberNET, LLC ("BalsamWest") currently uses CPNI only to market service offerings that are within the same category of the service that we already provide to the customer and, therefore, does not require customer approval pursuant to 47 CFR §64.2005. If in the future BalsamWest elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The company has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to Specifically, all new personnel are provided training on company policies and operational CPNI. procedures, including regulatory compliance and use of CPNI. BalsamWest provides to all personnel electronic copies of these company policies and procedures and provides immediate notice of subsequent changes to them. An electronic company memorandum on the conditions under which customer CPNI may be used with and without customer authorization has been sent to all personnel in accordance with this internal process. BalsamWest holds quarterly company meetings for the purpose of refresher training as it pertains to company policies, sales and marketing processes and operational procedures. BalsamWest Human Resource policies and processes to manage employee performance and adherence to company policies and procedures apply to managing personnel who do not adhere to CPNI related company policies and procedures. These include, but are not limited to, verbal and written warnings and, if not corrected or are done in a malicious or willful way, will lead to suspension or termination of Those individuals who have access to customer's CPNI have specific performance requirements related to use and protection of CPNI.

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

BalsamWest retains electronic and hard copy archives of all Sales and Marketing Campaigns related to BalsamWest services, whether done by BalsamWest or an affiliate. These records are retained for at least one year and more typically five years. The current company policy requires that all BalsamWest marketing, including outbound marketing, have approval of the COO.

The company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. BalsamWest operational procedures require that all requests for customer CPNI be in writing, whether from an authorized employee, third party or law enforcement, and these requests are maintained in BalsamWest archives for at least one year.